

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:15cr191
)	
CHARLES D. HALDERMAN,)	
)	
<i>Defendant.</i>)	
_____)	

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Count One of the Indictment are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. From in or about October 2015, to on or about November 8, 2015, in the Eastern District of Virginia, defendant, CHARLES D. HALDERMAN, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others to commit the offense of robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a).

2. In or about October 2015, HALDERMAN knowingly became part of a plan with Robert Doyle and others to take jewelry, precious metals, and U.S. currency from a local jewelry distributor by force and threats of violence. The jewelry distributor engaged in interstate commerce. In accordance with this plan, Doyle recruited HALDERMAN to assist in the robbery to take place sometime in November 2015.

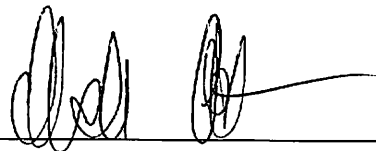
3. As part of the plan, HALDERMAN agreed to use a firearm and to assist other members of the conspiracy in taking, by force, certain jewelry, precious metals, and U.S.

currency. Accordingly to the plan, the intended victim had previously been approached by Doyle, and an order had been made to purchase approximately \$100,000 worth of jewelry and precious metals. A meeting was to take place where, instead of purchasing this property, HALDERMAN and other conspirators would rob the individual of the ordered items, as well as any other valuable property or currency that the jeweler had in his possession at the time.

4. Prior to the actual robbery taking place, the FBI inserted an undercover agent to pose as the jewelry distributor, and on November 8, 2015, arrested the defendant and his co-conspirators.


I have consulted with my attorney regarding this Statement of Facts and committed the acts described herein knowingly, intentionally, willfully and without legal justification or excuse, with the specific intent to do that which the law forbids, and not by mistake, accident, or any other reason. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

1-27-16
Date


Defendant


I am counsel for defendant, CHARLES D. HALDERMAN. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

1/27/16
Date


Counsel for Defendant

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



Peter S. Duffey
Assistant United States Attorney